## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

MEDICAL PROPERTIES TRUST, INC.,	
Plaintiff,	Case No. 2:23-cv-00408-JHE
v.	
VICEROY RESEARCH LLC, et al.,	
Defendants.	

## **DECLARATION OF FRASER PERRING**

- I, Fraser Perring, do hereby declare as follows:
- 1. I am a citizen and domiciliary of the United Kingdom and am over the age of 18.
  - 2. I am one of the members of Viceroy Research LLC ("Viceroy").
  - 3. Viceroy is an LLC organized under the laws of Delaware.
- 4. Viceroy has no operations in Alabama. It has never had offices there, employees or agents there, nor has it derived any revenue from any business activities in Alabama.
- Viceroy does not advertise or otherwise conduct or solicit business in
  Alabama.

- 6. No member, employee, agent, or anyone else connected to Viceroy has ever travelled to Alabama on any business related to Viceroy.
- 7. Viceroy publishes its reports and other statements exclusively on the internet, and does not direct those publications to any particular country, or state, including Alabama.
- 8. I have reviewed Medical Properties Trust, Inc.'s ("MPT") Complaint against Viceroy. None of the alleged defamatory statements that MPT complains about were published by Viceroy or anyone else in Alabama. Rather, all the alleged defamatory statements were published on the internet, addressing a global audience.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 21, 2023.

Praser Perring